

Ex. C – Tesla Parties’ response to Plaintiff’s Discovery Requests to Defendants



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VIA E-MAIL

Nicholas Woodfield
The Employment Law Group
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Re: Hansen v. Tesla, United State District Court, District of Nevada
3:19-cv-00413-LRH-WGC

Dear Nick:

We have received Plaintiff's Requests for Production of Documents and Interrogatories ("Written Discovery") propounded on Elon Musk, Tesla Motors, Inc. and Tesla, Inc. (together "Tesla Parties"). As you are aware, at the time the Written Discovery was propounded, the Parties were negotiating arbitration of Plaintiff's claims. When the negotiations failed, on February 27, 2020, the Tesla Parties moved to compel arbitration and stay the SOX claim ("Motion"). As of March 17, 2020, the Motion is fully briefed and pending resolution by the Court. At this time, the Tesla Parties object to all discovery pending resolution of the Motion, as it is premature and a waste of party resources. The Tesla Parties will respond to the Written Discovery within 15 days of a decision on the Motion by the Court, as necessary.

Additionally, the Parties have agreed to a stipulation to extend all pretrial deadlines in light of the current state of emergency declared at both the national and state level.

As a general matter, the Tesla Parties object to the Written Discovery to the extent that it seeks information that is protected from disclosure by the attorney-client privilege, the work product doctrine, or any other statutory or common law protection from discovery. In addition, the Tesla Parties object to any topic to the extent that it seeks information from outside the relevant time period of Plaintiff's employment and subsequent termination, seeks information that is not relevant to Plaintiff's claims and seeks information that is not in the custody or control of the



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Tesla Parties. Tesla will provide specific tailored objections and responses to each request and interrogatory, as appropriate, within 15 days of the Court issuing a decision on the Motion.

Pursuant to Local Rules I-A 1-3f and 26-7, this letter serves as our request to meet and confer regarding our respective positions on the Written Discovery and Motion.

Sincerely,

SEYFARTH SHAW LLP

A handwritten signature in blue ink, appearing to read 'C. Robertson', written over the printed name.

Christopher F. Robertson

CFR:avd

cc: Counsel of Record